

IN THE SUPREME COURT OF THE STATE OF NEVADA

NONA TOBIN, AN INDIVIDUAL,

Appellant,

v.

BRIAN CHIESI, AN INDIVIDUAL;
DEBORA CHIESI, AN INDIVIDUAL;
QUICKEN LOANS INC., A
CORPORATION

Respondents,

Electronically Filed
May 24 2021 03:13 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

Supreme Court No. 82234
District Court Case No. A-19-
799890-C

MOTION TO EXTEND TIME TO FILE
OPENING BRIEF AND APPENDIX

COMES NOW, Appellant NONA TOBIN, by and through her attorney, JOHN W. THOMSON, ESQ. of THOMSON LAW PC, and hereby submits this Motion to Extend Time to File Opening Brief and Appendix. This Motion is based on the pleadings and papers on file with the Court, and the Points and Authorities attached.

DATED this 24th day of May 2021.

THOMSON LAW PC

/s/ John W. Thomson
JOHN W. THOMSON, ESQ.
Nevada Bar No. 5802
2450 St. Rose Pkwy, Ste 120
Henderson, NV 89074
Attorney for Appellant Nona Tobin

MEMORANDUM OF POINTS AND AUTHORITIES

I. SUMMARY OF MOTION

The present matter is an appeal from the eighth judicial district court. Nona Tobin filed her Notice of Appeal as an individual on January 8, 2021. The Nevada Supreme Court issued an Order Removing from Settlement Program and Reinstating Briefing on February 22, 2021. Ms. Tobin's Opening Brief and Appendix is due on May 24, 2021. Appellant needs more time to prepare her Opening Brief and Appendix.

II. LEGAL ARGUMENT

NRAP 26(b)(1)(A) states:“(b) **Extending Time. (1) By Court Order** (A) For good cause, the court may extend the time prescribed by these Rules or by its order to perform any act, or may permit an act to be done after that time expires.”

This Court has discretion to extend the time for Ms. Tobin to file her Opening Brief and Appendix. Ms. Tobin has good cause for an extension of time; the reasons are: 1) Due to a heavy caseload and backlog of the courts due to the pandemic, appellant's attorney, a sole practitioner, needs additional time to complete the brief; and 2) attorney's time is also limited due to an

unexpected change in staff personnel. We respectfully request an extension of time until June 28, 2021.

III. Conclusion

WHEREFORE, Appellant Nona Tobin by and through her attorney of record, John W. Thomson, respectfully asks this Court to enter an order granting her an extension of time to file her Opening Brief and Appendix at the earliest date by June 28, 2021.

Dated this 24th day of May, 2021.

THOMSON LAW PC

By: /s/ John W. Thomson
JOHN W. THOMSON, ESQ.
Nevada Bar No. 5802
2450 St. Rose Parkway, Suite 120
Henderson, Nevada 89074
*Attorney for Appellant Nona
Tobin as an individual*

CERTIFICATE OF SERVICE

The undersigned hereby certifies on May 24, 2021, a true and correct copy of **APPELLANT NONA TOBIN'S MOTION TO EXTEND TIME TO FILE OPENING BRIEF AND APPENDIX** was served via the Court's Eflex service system.

/s/ John W. Thomson

An employee of the Thomson Law PC